

Nathan R. Ring  
NV State Bar No. 12078  
**STRANCH, JENNINGS & GARVEY, PLLC**  
3100 W. Charleston Boulevard, Suite 208  
Las Vegas, NV 89102  
Telephone: 725.235.9750  
lasvegas@stranchlaw.com

Jeff Ostrow (*admitted pro hac vice*)  
**KOPELOWITZ OSTROW FERGUSON  
WEISELBERG GILBERT**  
One West Las Olas Boulevard, Suite 500  
Fort Lauderdale, FL 33301  
Telephone: 954.525.4100  
ostrow@kolawyers.com  
*Attorneys for Plaintiff and the Proposed Class*

Todd L. Bice  
**PISANELLI BICE, PLLC**  
400 S. 7th Street Suite 300  
Las Vegas, NV 89101  
Telephone: 702.214.2100  
tlb@pisanellibice.com

Angela C. Agrusa (CA State Bar No 131337)\*  
**DLA PIPER LLP (US)**  
2000 Avenue of the Stars  
Suite 400 North Tower  
Los Angeles, CA 90067-4735  
Telephone: 310.595.3000  
angela.agrusa@us.dlapiper.com

*\*Pro hac vice application forthcoming*

*Attorneys for Defendant  
MGM Resorts International*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

EMILY KIRWAN, individually and on behalf  
of all others similarly situated

Plaintiff,

v.

MGM RESORTS INTERNATIONAL,

Defendant.

Case No. 2:23-cv-1481-RFB-DJA

**STIPULATION TO EXTEND TIME  
TO FILE DEFENDANT'S  
RESPONSE TO COMPLAINT  
(SECOND REQUEST)**

Pursuant to LR IA 6-1, Plaintiff Emily Kirwan and Defendant MGM Resorts International (“MGM”) (collectively, the “Parties”) respectfully stipulate MGM’s time to respond to the Complaint be extended from the current deadline of December 12, 2023 to and including January 11, 2024. This is the second stipulation for an extension of time to file MGM’s responsive pleading. The court previously granted an extension on October 18, 2023. ECF No. 16.

Good cause exists to enlarge the time for MGM to respond to the Complaint. There are currently ten other related actions filed against MGM pending in the District of Nevada (the “Related Actions”). *See Owens v. MGM Resorts Int’l*, No. 2:23-cv-1480 (D. Nev.); *Zussman v. VICI Properties 1 LLC, et al.*, No. 2:23-cv-01537 (D. Nev.); *Lackey v. MGM Resorts Int’l*, No. 2:23-cv-01549 (D. Nev.); *Pircio v. MGM Resorts Int’l*, No. 2:23-cv-01550 (D. Nev.); *Terezo v. MGM Resorts Int’l*, No. 2:23-cv-01577 (D. Nev.); *Rundell v. MGM Resorts Int’l*, No. 2:23-cv-01698 (D. Nev.); *Bezack v. MGM Resorts Int’l*, No. 2:23-cv-01719 (D. Nev.) *Albrigo v. MGM Resorts Int’l*, No. 2:23-cv-1981 (D. Nev.); *Zari v. MGM Resorts Int’l*, No. 2:23-cv-01777 (D. Nev.); *Manson v. MGM Resorts Int’l*, No. 2:23-cv-01826. One other action is pending in the District of New Jersey. *Lassoff v. MGM Resorts Int’l*, No. 1:23-cv-20419.

The parties in the Related Actions are actively preparing a joint motion to consolidate the Related Actions. As such, additional time is required to permit time to meet and confer with the various parties to the Related Actions and finalize the joint motion.

The Parties’ request is made in good faith to enable the parties to finalize the joint motion for consolidation and conserve judicial and party resources. Moreover, this case is in its infancy, and this request will not prejudice any party.

A proposed order is attached.

**WHEREAS** the Parties respectfully request that MGM shall have until January 11, 2024 to answer, move, or otherwise respond to the Complaint.

1 Dated: December 11, 2023

Respectfully submitted,

2 /s/ Nathan R. Ring

3 Nathan R. Ring  
4 **STRANCH, JENNINGS & GARVEY,**  
5 **PLLC**  
6 3100 W. Charleston Boulevard, Suite 208  
7 Las Vegas, NV 89102  
8 Telephone: 725.235.9750  
9 lasvegas@stranchlaw.com

10 Jeff Ostrow (*admitted pro hac vice*)  
11 **KOPELOWITZ OSTROW**  
12 **FERGUSON WEISELBERG**  
13 **GILBERT**  
14 One West Las Olas Boulevard, Suite 500  
15 Fort Lauderdale, FL 33301  
16 Telephone: 954.525.4100  
17 ostrow@kolawyers.com

18 *Attorneys for Plaintiff and the Proposed*  
19 *Class*

20 /s/ Todd L. Bice

21 Todd L. Bice  
22 **PISANELLI BICE, PLLC**  
23 400 S. 7th Street Suite 300  
24 Las Vegas, NV 89101  
25 Telephone: 702.214.2100  
26 tlb@pisanellibice.com

27 Angela C. Agrusa  
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*Attorneys for Defendant*  
*MGM Resorts International*

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 EMILY KIRWAN, individually and on behalf  
4 of all others similarly situated

5 Plaintiff,

6 v.

7 MGM RESORTS INTERNATIONAL,

8 Defendant.

Case No. 2:23-cv-1481-RFB-DJA

**ORDER GRANTING  
STIPULATION TO EXTEND TIME  
TO FILE DEFENDANT'S  
RESPONSE TO COMPLAINT**

9  
10 Upon consideration of the foregoing stipulation to extend Defendant MGM Resorts  
11 International's time to file response to Plaintiff's Complaint in the above-captioned action,  
12 it is hereby **ORDERED** that the Stipulation is **GRANTED**, and the time for MGM Resorts  
13 International to answer, move, or otherwise respond to Plaintiff's Complaint is hereby  
14 extended to and including January 11, 2024.

15 **IT IS SO ORDERED:**

16 

17 DANIEL J. ALBREGTS  
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 12/13/2023